

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ZACHARY HOOPER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

AMAZON.COM SERVICES LLC, a
Delaware Limited Liability Company, and
DOES 1-10, inclusive,

Defendants.

No. 2:24-cv-00056

**STIPULATED MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT
AND ORDER**

STIPULATION

Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff Zachary Hooper and Defendant Amazon.com Services LLC (“Amazon”) hereby jointly stipulate as follows:

1. On December 6, 2023, Plaintiff filed a Class Action Complaint (“Complaint”) against Amazon in King County Superior Court. Plaintiff served a copy of the Complaint on Amazon on December 12, 2023.

2. On January 11, 2024, Amazon removed this matter to this Court. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), Amazon’s responsive pleading is due on January 18, 2024.

3. In the interest of judicial economy, Plaintiff and Amazon jointly stipulate to extending Amazon’s deadline to respond to the Complaint to February 26, 2024.

STIPULATED MOTION TO EXTEND
RESPONSE DEADLINE (NO. 2:24-CV-00056) – 1

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

4. Good cause supports this joint motion. Motions practice may be reduced or avoided by a brief continuance because the parties are engaged in discussions regarding the possibility of mediation and/or motions practice, including a potential motion to remand to Superior Court. In addition, additional time is necessary for Amazon to fully investigate the allegations in the Complaint and for counsel to meet and confer about the same. A Rule 26(f) conference of counsel has already been scheduled.

5. This is the first request for an extension. No other dates or deadlines would be altered by this proposed extension of time.

6. This stipulation is without prejudice to Plaintiff's right to seek remand to Superior Court.

RESPECTFULLY SUBMITTED this 17th day of January 2024.

ACKERMANN & TILAJEF, P.C.

By: s/ Craig J. Ackermann
 Craig J. Ackermann, WSBA #53330
 Brian Denlinger, WSBA #53177
 Avi Kreitenberg, WSBA #53294
Ackermann & Tilajef, P.C.
 2602 North Proctor Street, Suite 205
 Tacoma, WA 98406
 Telephone: 253.625.7720
 Facsimile: 253.276.0081
 cja@ackermanntilajef.com
 bd@ackermanntilajef.com
 ak@ackermanntilajef.com

Attorneys for Plaintiff

PERKINS COIE LLP

By: s/ Andrew E. Moriarty
 Andrew E. Moriarty, WSBA No. 28651
 Kyle D. Nelson, WSBA No. 49981
 Shannon McDermott, WSBA 59455
Perkins Coie LLP
 1201 Third Avenue, Suite 4900
 Seattle, WA 98101-3099
 Telephone: 206.359.8000
 Facsimile: 206.359.9000
 AMoriarty@perkinscoie.com
 KyleNelson@perkinscoie.com
 SMcDermott@perkinscoie.com

**Attorneys for Defendant Amazon.com
 Services LLC**

ORDER

Based on the foregoing stipulation, IT IS ORDERED that Amazon's deadline to respond to the Complaint is February 26, 2024.

DATED this 18th day of January 2024.



Barbara J. Rothstein
United States District Judge

PRESENTED BY:

By: s/ Andrew E. Moriarty
Andrew E. Moriarty, WSBA No. 28651
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
AMoriarty@perkinscoie.com

Attorneys for Defendant Amazon.com Services LLC

CERTIFICATE OF SERVICE

I certify under penalty of perjury that on January 17, 2024, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Dated: January 17, 2024.

s/ Erin Koehler
Legal Practice Assistant